

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Michael and Carina Hill,

Civil No. 25-cv-2396

Plaintiffs,

vs.

NOTICE OF REMOVAL

Camping World RV Sales - Hugo,

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA, and

PLAINTIFFS ABOVE-NAMED AND THEIR ATTORNEY, JON E. STANEK,
ESQ., STANEK LAW OFFICE, 100 FULLER STREET, SUITE 120,
SHAKOPEE, MN 55379.

PLEASE TAKE NOTICE that Defendant Camping World RV Sales, LLC dba
Camping World RV Sales (“Camping World”) (improperly identified in the caption as
Camping World RV Sales – Hugo) hereby removes the State Court action described
below to this Court pursuant to 28 U.S.C. §§ 1331, 1367, and 1441, *et seq.* and
respectfully states as follows:

1. Plaintiffs filed the removed action on or about May 5, 2025, in the
Washington County District Court, State of Minnesota, and Camping World was
thereafter notified of the action by receipt on May 20, 2025 of a notice of case filing sent
via U.S. Mail. It is entitled *Michael and Carina Hill v. Camping World RV Sales – Hugo*,
Court File No. 82-CV-25-2674, and is now pending in said Court. True and correct
copies of the Summons and Complaint are attached hereto as Exhibit A. No further

proceedings have been had therein. This Notice of Removal is timely filed within the 30-day period prescribed by 28 U.S.C. § 1446(b).

2. This action may be removed from the Washington County District Court, in the State of Minnesota, pursuant to 28 U.S.C. §§ 1441 and 1331 (federal question jurisdiction), because the District of Minnesota is the District embracing the place where the action is pending.

3. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, because the action includes a claim by Plaintiffs against Defendant for alleged violation of a federal law, the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301, *et seq.*

4. Contemporaneous with this filing, Defendant is serving notice of the filing of this Removal on Plaintiffs' counsel. A Notice of Filing of Removal of action to Federal Court is also being filed in the Washington County District Court.

WHEREFORE, Defendant removes this action from the Washington County District Court in the State of Minnesota, and respectfully requests any further relief, general or specific, at law or in equity, to which it may be justly entitled.

BASSFORD REMELE
A Professional Association

Dated: June 10, 2025

/s/ Christopher R. Morris
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